

**UNDER SEAL**



MONTCLAIR, NJ NEW YORK, NY

THOMAS O. JOHNSTON  
tjohnston@johnstonlawfirmllc.com  
Member NJ and NY Bars

March 4, 2020

**VIA HAND DELIVERY**

Clerk, United States District Court  
District of New Jersey  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: HATIKVAH INTERNATIONAL ACADEMY CHARTER SCHOOL v. EAST**

**BRUNSWICK TOWNSHIP BOARD OF EDUCATION**

Civil Action No. : TBA

Dear Sir/Madam:

We are counsel to Plaintiff Hatikvah International Academy Charter School in the above matter. We herein enclose the following:

1. Proposed Order to Show Cause;
2. Verified Complaint for Preliminary Injunction, with exhibits, under seal;
3. Civil Cover Sheet;
4. Memorandum of Law in Support of Application for Injunctive Relief;
5. *E.M. o/b/o J.B. v. East Orange Board of Education*, decided June 26, 2008 (unreported);
6. Certification of Marcia Grayson, with exhibits, dated January 28, 2020; and
7. Proposed Order for Injunction.

*Please note that we respectfully request that you file the exhibits enclosed herewith under seal, pursuant to Local Rule 5.2. Such exhibits are student records protected from public disclosure under the Family Educational Rights and Privacy Act, 20 U.S.C. §1232g and N.J.A.C. 6A:32-7.1 et seq.*

JOHNSTON  
— LAW FIRM, LLC —

Clerk, United States District Court

District of New Jersey

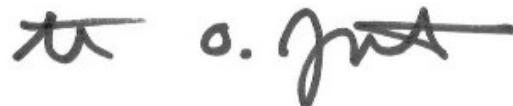
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This matter arises from an emergent dispute between Hatikvah and East Brunswick Board of Education and H.K.'s parents about the application of the "stay put" automatic injunction provisions under the Individuals with Disabilities Education Act, 20 U.S.C. 1415(j).

Please stamp one copy of the enclosed as "filed" and return to us in the self-addressed, stamped envelope. Thank you for your kind courtesies in this regard.

Respectfully submitted,



Thomas O. Johnston

TJ/yI

Enc.

Cc: **VIA FEDERAL EXPRESS**

Hon. Susan Olgiati, ALJ  
Office of Administrative Law  
3444 Quakerbridge Road  
Quakerbridge Plaza-Bldg.9  
Mercerville (Hamilton Twp.), NJ 08619

Jodi S. Howlett, Esq.  
Cleary, Giacobbe, Alfiere and Jacobs, LLC  
955 Route 34  
Suite 200  
Matawan, NJ 07747

Michael I. Inzelbuch, Esq.  
1340 West County Line Road  
Lakewood, NJ 08701